

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**[PROPOSED] STIPULATION AND ORDER TO WAIVE CONFIDENTIALITY OF
CERTAIN DISCOVERY MATERIALS**

This Stipulation (“Stipulation”) is entered into by and among Lehman Brothers Special Financing Inc. (“LBSF”), Lehman Brothers Holdings Inc. (“LBHI,” and together with LBSF, “Lehman”), Quintessence Fund L.P. (“Quintessence”), and QVT Fund LP (“QVT Fund,” and together with Quintessence, “QVT”).

WHEREAS, the Parties entered into a Stipulation And Order Governing The Production Of Confidential Materials, which was So Ordered by the Court on March 18, 2015 (ECF No. 48920) (the “Confidentiality Order”);

WHEREAS, on January 19, 2017, the Bankruptcy Court So Ordered the Revised Fifth Stipulated Claims Litigation and Pre-Trial Schedule (filed on January 20, 2017 at ECF No. 54574); and

WHEREAS, the Parties have entered into this Stipulation and agreed to be bound by its terms,

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

1. To the extent material produced by the Parties in this dispute, deposition testimony, and the Parties’ Expert Reports (collectively, the “Discovery Materials”) have been

designated as Confidential pursuant to the Confidentiality Order, the Parties agree to waive confidentiality except for the categories of information described in paragraphs 2 and 3 below.

2. This waiver does not extend to portions of the Discovery Materials that include confidential information of a third party.

3. This waiver does not extend to any information relating to QVT's bank account information.

Dated: January 30, 2017
New York, New York

/s/ Lauri W. Sawyer

Jayant W. Tambe
Laura Washington Sawyer
Jennifer L. Del Medico
Ryan J. Andreoli

JONES DAY
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

jwtambe@jonesday.com
lwsawyer@jonesday.com
jdelmedico@jonesday.com
randreoli@jonesday.com

*Attorneys for Debtors and
Debtors in Possession*

Dated: January 30, 2017
New York, New York

/s/ Dennis H. Tracey

Dennis H. Tracey, III
Robin E. Keller
William M. Regan
Benjamin J.O. Lewis
John D. Beck

HOGAN LOVELLS US LLP
875 Third Avenue
New York, New York 10022
Telephone: (212) 918-3000
Facsimile: (212) 918-3100

dennis.tracey@hoganlovells.com
robin.keller@hoganlovells.com
william.regan@hoganlovells.com
ben.lewis@hoganlovells.com
john.beck@hoganlovells.com

*Attorneys for QVT Fund LP and
Quintessence Fund L.P.*

Dated: _____, 2017
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE